

Thomas-Jensen Affirmation

Exhibit # 114

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF NEW YORK; et al.,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as President of the United States; et al.,

Defendants.

C.A. No. 1:25-cv-00039-JJM-PAS

DECLARATION OF LESLIE ANNE BRUNELLI

Declaration of Leslie Anne Brunelli

I, Leslie Anne Brunelli, declare as follows:

1. I am a resident of the Commonwealth/State of Washington. I am over the age of 18 and have personal knowledge of all the facts stated herein, except to those matters stated upon information and belief; as to those matters, I believe them to be true. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by Washington State University as Executive Vice President for Finance and Administration and Chief Financial Officer. In my role, I am responsible for the financial management, planning and budgeting activities of the Washington State University, including oversight of post award administration and federal cash management. One significant source of federal funding for Washington State University is USAID.

USAID Funded Washington State University Projects

3. As reflected by the Washington State University financial system records as of the date of this declaration, USAID has awarded Washington State University's College of Veterinary Medicine School of Medicine five grants.

a. AWD000406: USAID Feed the Future Animal Health Innovation Lab for East Coast Fever Control with a budget of \$5,700,000, and \$1,014,404 remaining.

- b. AWD006310: Feed the Future Innovation Lab for Fish with a budget of \$99,998, and \$89,298 remaining.
- c. AWD006322: One Health Approaches to Mitigate Brucellosis with a budget of \$186,416, 155,085 remaining, and \$13,380 in outstanding unpaid invoices
- d. AWD006496: Feed the Future Innovation Lab for Veterinary Vaccine Delivery with a budget of \$2,100,000, \$1,966,358 remaining, and \$52,649 in outstanding unpaid invoices.
- e. AWD006710: Improving Fish-Related Food Safety Practices in Bangladesh with a budget of \$166,732, and \$166,732 remaining. Washington State University is a sub-recipient of this award, and Mississippi State University is the prime recipient.

4. Additionally, USAID also awarded the State of Washington Water Research Center, which is administered through the Washington State University Office of Research., AWD001096: Centers of Excellence for Agriculture and Water with a budget of \$906,861, \$319,052 remaining, and \$60,000 in outstanding unpaid invoices. The mission of this project is to create a Center of Excellence for Water in Alexandria (COE-W) and a Center of Excellent for Agriculture (COE-A) in Cairo that benefits both Egypt and the USA through the mutual development of research, education, and training objectives.

5. Lastly, USAID awarded Washington State University's College of Arts and Sciences AWD004984: Building Trust and Cohesion to Reduce the Risk of Violent Extremism in Northern Ghana with a budget of \$348,754, \$17,558 remaining, and \$25,004 in outstanding unpaid invoices. Washington State University is a sup-recipient of the award, and the prime recipient is University of Maryland College Park. This "Trust2Peace Activity" compliments other USAID/Ghana peacebuilding programs by working with some communities in northern Ghana to improve relationships between potentially conflicting groups, build social trust, and equip citizens with skills to resolve conflicts, promote peace, and prevent violent extremism.

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USAID Suspension/Stop Work Orders Froze Funds Already Obligated to Washington State University

6. Our USAID grantees have all received Suspension/Stop Work Orders from either USAID or the prime award recipients. Attached as Exhibit A please find a true and correct copy of the notice one of our grantees received from USAID dated January 26, 2025. Attached as Exhibit B please find a true and correct copy of the notice one of our grantees received from Mississippi State University dated January 28, 2025.

7. Washington State University's budget has relied on receipt of \$9,508,761 from USAID. We currently have a total contracted or due of \$3,819,519.13 and we made plans and allocated funding for staffing based on the anticipated receipt of USAID funds.

8. If we do not receive such disbursements, it will negatively impact important USAID-Washington State University programs, such as Feed the Future Innovation Labs (FTFILs) (see Award Nos. AWD006710 and AWD006496). There are 17 FTFILs, hosted by 13 land grant and non-land grant universities across the United States, that were authorized under Title XII of the Foreign Assistance Act of 1961. These labs are currently under a suspension notice/stop-work order from USAID. The current suspension that has been received by all FTFILs is affecting over personnel within the immediate institutions, with multiplier effects that will impact countless others in both urban and rural communities across the 29 states through immediate loss of economic activity.

9. While FTFILs are supported through foreign assistance funds, resources are being directly spent in the United States. These US-based programs protect US farmers from pests and diseases, benefit US companies including small businesses, ensure growing markets for US products, and promote US national security by generating goodwill for our country across vast swaths of the globe.

10. FTFIL's focus on leveraging the advanced capacities of US Universities ranging from key US commodity crops, such as staple grains, legumes, soybeans, peanuts, fruits, vegetables, and efficient management of crop, water and soils, irrigation and mechanization,

current and emerging threats especially to US crops, agricultural insurance, animal health (including vaccine delivery), livestock and aquatic systems to issues of agricultural and food security policy, food safety, investment and policy for dynamic food system transformation, and nutrition.

11. For Award Numbers AWD000406; AWD006322; AWD006496: USAID's investment in livestock animal health is critical for global food security, public health, and economic stability. USAID funded projects, led by Washington State University (WSU) veterinary scientists Thumbi Mwangi and Felix Lankester, focus on combating deadly livestock diseases through vaccine development, rapid diagnostics, and capacity building in low-resource settings. The impacts of these projects include:

- Combatting High-Impact Livestock Diseases: These projects target major livestock diseases, including Crimean-Congo Hemorrhagic Fever, Contagious Bovine Pleuropneumonia, East Coast Fever. By addressing these diseases, the projects enhance livestock survival rates, protect farmers' livelihoods, and reduce the risk of disease transmission to humans.
- Preventing Disease Spillover to the U.S.: With changing tick habitats, diseases such as CCHF have the potential to spread beyond endemic regions. Proactive research and intervention abroad mitigate the risk of outbreaks reaching the U.S., safeguarding American agriculture and public health.
- Strengthening Global Food Security and Safety: Healthy livestock are essential for stable food supplies. These projects improve: food security, food safety, and resilience.
- Advancing Early Detection and Diagnosis: Rapid-response strategies, such as Pen Side Diagnostics, enable on-the-spot detection of infectious diseases, preventing outbreaks before they escalate.
- Capacity Building in Low-Resource Countries: These USAID-funded initiatives also invest in building laboratory capacity and training scientific workforce.

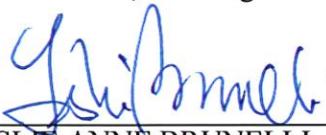
- Supporting Economic and Workforce Development: The projects provide direct employment opportunities, supporting: Washington State employees working on vaccine and diagnostic development; and Kenyan citizens involved in field implementation and laboratory research.
- Addressing Biothreats and Global Health Security: Certain livestock pathogens, including those studied in these projects, have the potential to be used as biological weapons. Strengthening surveillance and response mechanisms protects against such threats.

These USAID-backed projects are a strategic investment in global health security, economic stability, and food sustainability. By tackling livestock diseases at their source, they not only protect vulnerable farming communities but also prevent potential threats to the U.S. and beyond.

12. To my knowledge, USAID funding has not been restored since the Rhode Island District Court entered a Temporary Restraining Order in *New York v. Trump* on January 31, 2025.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 5th day of February 2025, at Pullman, Washington.



LESLIE ANNE BRUNELLI
Executive Vice President for Finance and
Administration and Chief Financial Officer
Washington State University

Exhibit A



USAID | EGYPT
FROM THE AMERICAN PEOPLE

January 26, 2025

Subject: Suspension/Stop Work Order of Activities for all USAID/Egypt Programs

Re: Executive Order "[Reevaluating and Realigning United States Foreign Aid;](#)" [Notice on Implementation of Executive Order: Reevaluating and Realigning United States Foreign Aid;](#) and [Executive Order "Ending Radical And Wasteful Government DEI Programs And Preferencing".](#)

Dear USAID/Egypt Implementing Partners:

This notice serves as a directive to all USAID/Egypt Implementing Partners (IPs) to immediately stop, cease, and/or suspend any work being performed under your respective USAID/Egypt contract, task order, grant, cooperative agreement, or other acquisition or assistance instrument in accordance with the [Executive Order dated January 20, 2025 and entitled "Reevaluating and Realigning United States Foreign Aid."](#)

This action is taken in accordance with the applicable authority under your award, which may include:

- FAR Clause 52.242-15 Stop-Work Order (or Alternate I);
- 2 CFR 700.14 (Award Suspension and Termination); or
- the Mandatory Standard Provisions for Non-U.S. Nongovernmental Organizations on Award Suspension and Termination, as appropriate.

All IPs must immediately begin to comply with this Suspension/Stop Work Order. The IP shall not resume work under the acquisition or assistance award until notification has been received in writing from the Contracting/Agreement Officer that this Suspension/Stop Work Order has been cancelled. Further, all IPs must issue a 90-day suspension of all subcontracts and subawards already signed under the prime award.

The Secretary of State has approved waivers of the pause under the Executive Order, subject to further review, with respect to:

1. emergency food assistance and administrative expenses, including salaries, necessary to administer such assistance; and

2. legitimate expenses incurred prior to January 24, 2025, under existing awards or legitimate expenses associated with stop-work orders, suspensions, or pause-related amendments.

Partners shall take all reasonable steps to minimize the incurrence of costs allocable to their awards.

Additionally, and in accordance with the "[Notice on Implementation of Executive Order: DEIA Activities under Existing USAID Awards](#)" sent by Jami J. Rodgers, USAID Senior Procurement Executive on January 24, 2025, please send a certification that DEIA-related activities under your award have completely ceased to Egypt.OAA@usaid.gov with a copy to the USAID Industry Liaison team with the Subject Line: "DEIA Partner Certification" at IndustryLiaison@usaid.gov. The confirmation should include a statement confirming that all DEIA activities have stopped and a confirmation that no further costs will be incurred related to DEIA activities under your contract/agreement with USAID. If your award does not include any DEIA activities, please respond stating that.

Please confirm your receipt and acknowledgement with this Suspension/Stop Work Order by replying to Egypt.OAA@usaid.gov.

Should you have questions concerning this letter, please submit them at Egypt.OAA@usaid.gov and copy your cognizant AOR/COR and Contracting/Agreement Officer. We will follow up with further guidance as soon as possible.

Thank you for your understanding and cooperation.

Sincerely,

Matthew Courtad, Director
Contracting/Agreements Officer
USAID/Egypt Office Acquisition and Assistance

Exhibit B



MISSISSIPPI STATE
UNIVERSITY™

Office of Sponsored Projects

P.O. Box 6156
301 Research Blvd
Starkville, MS 39759

P. 662.325.7404
F. 662.325.3803

www.osp.msstate.edu

January 28, 2025

Project Title: Improving Fish-Related Food Safety Practices in Bangladesh

Project Dates: January 1, 2025 – December 31, 2025

Funding Request: \$166,732.00

PI: Mohammad Aminul Islam

Subject: USAID Cooperative Agreement No. 7200AA18CA00030 – MSU subaward 193900.312455.14C

Dear Washington State University:

Mississippi State University has just received notification from USAID that, pursuant to 2 CFR 700.14, all actions and funding obligations for this award have been suspended until further notice. This letter serves as an official notification to immediately stop work on the subject award until otherwise directed.

You shall immediately comply with the terms of this letter and no work shall be performed under this award until further notice.

Please acknowledge receipt of this letter. If you have any questions regarding this action, please do not hesitate to contact our office.

Sincerely,


Kacey Strickland (Jan 28, 2025 14:24 CST)

Kacey Strickland
Assistant Vice President & Executive Director, Research Administration
Mississippi State University

Acknowledgement of Receipt:

Name:

Date:

Title: